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March 26, 2019

To the Honorable Common Council
of the City of Milwaukee
Room 205 – City Hall

Re: Ronnie Martin v. Dominique Heaggan-Brown, et al.
Case No.: 16-cv-1702

Dear Council Members:

Enclosed is a proposed resolution and fiscal note authorizing payment of a settlement amount regarding the above-referenced matter. We request that the enclosed documents be referred to the appropriate committee for review.

Mr. Martin claimed that former Officer Heaggan-Brown and his partner, Officer Hauser used excessive force in effecting his arrest on April 15, 2016. Further, Mr. Martin asserted that each officer observed the other use excessive force, but failed to intervene to stop it.

Pursuant to mediation efforts under the auspices of the trial judge and with the risks of trial in mind, the parties engaged in settlement discussions. Mr. Martin has agreed to settle the entire case for a total of \$18,000.00, which includes attorneys' fees and costs.

Because of the unpredictability of a trial, and the City's risk for exposure to compensatory and punitive damages, as well as additional attorney fees and costs, we recommend that this matter be settled for that amount. Consistent with our recommendation, we have enclosed an appropriate resolution for your consideration.

Very truly yours,


GRANT F. LANGLEY
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1032-2017-386:258016

